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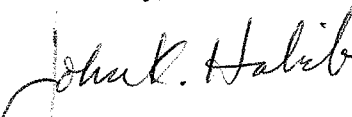
Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: Boston Edison Company, Cambridge Electric Light Company and
Commonwealth Electric Company, D.T.E. 03-100

Enclosed for filing in the above-referenced matter is the first set of information requests of Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company d/b/a NSTAR Electric to the Cape Light Contact and Massachusetts Energy Consumers Alliance.

Thank you for your attention to this matter.

Sincerely,


John K. Habib

Enclosure

cc: William Stevens, Hearing Officer
Service List

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Boston Edison Company)
Cambridge Electric Light Company)
Commonwealth Electric Company)

D.T.E. 03-100

**NSTAR ELECTRIC FIRST SET OF INFORMATION REQUESTS TO THE
CAPE LIGHT COMPACT AND MASSACHUSETTS CONSUMERS ALLIANCE**

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by NSTAR Electric in this proceeding.

1. Each request should be answered in writing on a separate page (paginated) with a recitation of the request, the identification number of the request (for example, NSTAR-CLC/MEC-1-1), the docket number of the case, the date of the response, and the preparer of the response or the name of the person responsible for the answer. Please mark each page of an answer with the identification number of the request. In addition, please clearly reference any attachments to a response with the number of the request to which it applies and include page numbers on all attachments.
2. Please do not wait for all responses to be completed before supplying answers, but instead please provide the answers as they are completed.
3. These information requests shall be deemed continuing in nature so as to require further supplementation if the Cape Light Compact/Massachusetts Energy Consumers Alliance or their witnesses receive or generate additional information within the scope of those requests between the time of the original response and the close of the record in these proceedings.
4. The terms used interchangeably within these information requests relating to "any and all", "documentation", "support", and "justification" mean provide all data, assumptions, and calculations relied on. Provide the source of and basis for all data and assumptions employed. Include all studies, drafts, memos, reports, and planning documents from which such data, estimates and assumptions were used. Provide and explain any and all supporting workpapers.
5. The term "document" is used in its broadest sense and includes, without

limitation, writings, drawings, graphs, charts, photographs, phonographic records, microfilm, microfiche, computer printouts, memoranda, letters, correspondence, handwritten notes, records and reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If the Respondent believes that any of these information requests are ambiguous or need clarification, please contact Robert Werlin or John Habib at (617) 951-1400 so that the requests can be clarified prior to the preparation of a written response.
7. If an answer provides a reference to another information response, please provide that response with the answer.
8. If a question refers to an information request of another party, please provide an answer with information that supplements the previous responses.

Information Requests

A. Information Requests Relating to the Prefiled Testimony of Mr. Grace

- NSTAR-CLC/MEC-1-1 Please provide copies of (1) all prefiled testimony or reports (including all associated exhibits and attachments) submitted by Mr. Grace to state and federal regulatory authorities from 1993 to the present; and (2) transcripts of Mr. Grace's testimony at hearings (adjudicatory or non-adjudicatory) before state and federal regulatory authorities from 1993 to the present.
- NSTAR-CLC/MEC-1-2 Provide copies of all regulatory decisions addressing the issues covered by Mr. Grace in testimony provided in response to NSTAR-CLC/MEC-1-1. Identify the decision making authority, docket number, year of the decision, and any official citation to the decision.
- NSTAR-CLC/MEC-1-3 Please list all matters on which Mr. Grace has consulted in the past five years by date beginning with the most current matters. For each matter, provide a brief description of the subject matter of the project and indicate for whom these services were provided.
- NSTAR-CLC/MEC-1-4 Please identify all documents relied upon by Mr. Grace in preparing this testimony. Please provide a copy of each identified document.

- NSTAR-CLC/MEC-1-5 Is Mr. Grace being paid for his testimony in this proceeding? If so, how much and by whom? Please provide a copy of any written contract, agreement or other document memorializing the terms of his engagement as a witness in this proceeding.
- NSTAR-CLC/MEC-1-6 Referring to page 2, lines 10-15, please provide copies and all documents produced by Mr. Grace relating to expert analysis he provided to state agencies with respect to renewable or green power.
- NSTAR-CLC/MEC-1-7 Referring to page 7, lines 2-10, please describe in detail the “comparable service” offerings of Mass Energy or Conservation Services Group. Please provide any and all documents and/or marketing materials relating to those service offerings.
- NSTAR-CLC/MEC-1-8 Referring to page 7, lines 2-10, in what communities in the “NSTAR territory” are Mass Energy and/or Conservation Services Group offering “comparable service to that proposed by NSTAR to small customers”? Please provide any and all documents that relate to this response.
- NSTAR-CLC/MEC-1-9 Referring to page 7, lines 2-10, how are Mass Energy and Conservation Services Group marketing their respective service to small customers in NSTAR’s service territory? Please provide any and all documents that relate to this response.
- NSTAR-CLC/MEC-1-10 Referring to page 7, lines 13-19, do you have any information from Community Energy, Sterling Planet, Conservation Services Group or Mass Energy that any or all of these organizations will make comparable service offerings to small customers in the NSTAR territory? If so, please describe in detail any such information and provide any and all documents that relate to this response.
- NSTAR-CLC/MEC-1-11 Referring to page 8, lines 2-3, please define “access to...the customer bill...”.
- NSTAR-CLC/MEC-1-12 Referring to page 8, lines 3-4, please define “dense media market” and describe whether it is your view that the NSTAR Electric service territory is in a dense media market.
- NSTAR-CLC/MEC-1-13 Referring to pages 9 (lines 18-22) and 10 (lines 1 and 2), please describe any impediments experienced by the Compact in obtaining “access to timely information on the customer’s usage volume.” Please also explain why access to customer

usage volume would be an obstacle for the Compact in implementing its own REC offering.

- NSTAR-CLC/MEC-1-14 Referring to page 11, lines 10-14, please provide a description of and the price for CSG's ReGen offering. Provide any and all documents that relate to this response.
- NSTAR-CLC/MEC-1-15 Referring to page 11, lines 16-18, please provide a description of and the price for Mass Energy's New England Green Start offering. Provide any and all documents that relate to this response.
- NSTAR-CLC/MEC-1-16 Referring to page 11, lines 18-21, please identify and provide a description of and the prices for the "two other offerings" mentioned. Provide any and all documents that relate to this response.
- NSTAR-CLC/MEC-1-17 Referring to page 12, lines 5-7, please provide the basis for your opinion that "competing vendors of green power...are capable of supply more customers than NSTAR in the near term...". Provide any and all documents that relate to this response.
- NSTAR-CLC/MEC-1-18 Referring to page 12, lines 7-8, please identify the "additional new supply expected to come online with a year or so...". Provide any and all documents that relate to this response.
- NSTAR-CLC/MEC-1-19 Referring to page 13, line 2, please provide: (a) the effective date of the contract(s) for RECs that comprise the New England Wind offering; (b) the source of the certificates for the New England Wind offering; (c) the maximum number of certificates under contract that can be purchased to provide service under New England Wind; (d) the number of customers presently subscribing to the New England Wind offering; (e) the maximum projected number of customers that could be served under the New England Wind offering; (f) a description of the competitive process used to procure the RECs; and (g) the term of the agreement for the certificates. Please also calculate a price for the offering based on the average daily market price for RECs for the most recent month for which data is available. Provide any and all documents that relate to this response.
- NSTAR-CLC/MEC-1-20 Referring to page 18, lines 1-3, please provide a copy of the referenced study by The Clean Energy States Alliance.

- NSTAR-CLC/MEC-1-21 Referring to page 19, lines 9-20, how many media markets exist in Massachusetts? Provide any and all documents that relate to this response.
- NSTAR-CLC/MEC-1-22 Referring to page 20, lines 1-2, what is the basis for the statement that “there is little supplier interest in offering a green bundled electric product to NSTAR’s small customers at this time”? Provide any and all documents that relate to this response.
- NSTAR-CLC/MEC-1-23 Referring to page 24, line 22 through and page 25, line 2, please identify the “principles of cost causation followed by the Department” and provide citations and excerpts from Department orders that relate to this response.
- NSTAR-CLC/MEC-1-24 Referring to page 25, lines 13-14, please describe Mr. Grace’s “own experience” upon which he relies to estimate NSTAR’s costs. Provide any and all documents that relate to this response.
- NSTAR-CLC/MEC-1-25 Referring to page 25, line 23 through page 26, line 5, please provide the basis for the “conservative estimate of average customer longevity of 24 months”. Provide any and all documents that relate to this response.
- NSTAR-CLC/MEC-1-26 Referring to page 27, line 21 through page 28 line 3, provide Mr. Grace’s understanding of the job responsibilities for each of the nine identified employees.
- NSTAR-CLC/MEC-1-27 Referring to page 28, lines 6-9, provide the basis for the determination that the nine identified employees devoted an average of 20 percent of the time on this project for a one-year period.
- NSTAR-CLC/MEC-1-28 Referring to page 28, lines 14-15, (a) describe “outsourced product development costs and (b) provide the basis for the estimated expense. Provide any and all documents that relate to this response.
- NSTAR-CLC/MEC-1-29 Referring to page 28, lines 15-17, provide the basis for the estimated \$30,000 expense. Provide any and all documents that relate to this response.
- NSTAR-CLC/MEC-1-30 Referring to page 28, line 17, provide the basis for the estimated \$5,000 expense for an initial press conference. Provide any and all documents that relate to this response.

- NSTAR-CLC/MEC-1-31 Referring to page 28, line 21 through page 29 line 1, provide the basis for the estimated \$10,000 expense. Provide any and all documents that relate to this response.
- NSTAR-CLC/MEC-1-32 Referring to page 29, lines 7-8, provide the basis for the estimate that "incremental and allocated administrative costs require one full time equivalent" employee per year. Provide any and all documents that relate to this response.
- NSTAR-CLC/MEC-1-33 Referring to page 34, line 34 and Exhibit RCG-11, please provide the following for each listed program:
- (a) A description of the program offering
 - (b) Customer eligibility criteria
 - (c) Source, type and percentages of green resources provided
 - (d) Pricing and term of customer commitment for green option(s)
 - (e) A description of marketing efforts
 - (f) Method that penetration rate was computed
 - (g) Whether competitive green options are available.
- NSTAR-CLC/MEC-1-34 Please provide any and all documents that relate to the response to Information Request NSTAR-CLC/MEC-1-32.
- NSTAR-CLC/MEC-1-35 Referring to page 40, lines 13-22, please provide the following for the PGE and PP&L programs:
- (a) A description of the program offering
 - (b) Customer eligibility criteria
 - (c) Source, type and percentages of green resources provided
 - (d) Pricing and term of customer commitment for green option(s)
 - (e) A description of marketing efforts
 - (f) Method that penetration rate was computed
 - (g) Whether competitive green options are available.

NSTAR-CLC/MEC-1-36 Please provide any and all documents that relate to the response to Information Request NSTAR-CLC/MEC-1-34.

NSTAR-CLC/MEC-1-37 Referring to page 41, lines 1-14, please provide the following for the NiMo and MECo programs:

- (a) A description of the program offering
- (b) Customer eligibility criteria
- (c) Source, type and percentages of green resources provided
- (d) Pricing and term of customer commitment for green option(s)
- (e) A description of marketing efforts
- (f) Method that penetration rate was computed
- (g) Whether competitive green options are available.

NSTAR-CLC/MEC-1-38 Referring to page 42, lines 3-16, please provide any and all documents relating to the programs to be implemented or being considered for: (a) Narragansett Electric; (b) Connecticut Light and Power; (c) United Illuminating; and (d) the Long Island Power Authority.

B. Information Requests Relating to the Prefiled Testimony of Mr. Mahoney

NSTAR-CLC/MEC-1-39 Please provide a resume or curriculum vitae.

NSTAR-CLC/MEC-1-40 Please describe your professional experience in providing renewable electricity products to end-use customers.

NSTAR-CLC/MEC-1-41 Please describe your professional experience developing renewable generation resources

NSTAR-CLC/MEC-1-42 Referring to page 3, lines 5-6, please describe the renewable energy certificate products that the Compact would like to offer its customers.

NSTAR-CLC/MEC-1-43 Referring to page 3, lines 5-6, please describe the cost components that would be included in the price of a renewable energy certificate product offered by the Compact.

NSTAR-CLC/MEC-1-44 Referring to page 3, lines 2-7, please describe why the Compact would not be able to offer its own renewable energy certificate product to Compact customers if NSTAR offers

customers an option to purchase renewable energy certificates through the NSTAR Green Program.

NSTAR-CLC/MEC-1-45 Referring to page 8, lines 14-18, is it the Compact's position that it could now offer renewable energy option by providing it as part of a competitive generation service? If not, please explain in detail.

NSTAR-CLC/MEC-1-46 Referring to page 8, lines 14-18, will the Compact continue to provide generation service to customers? If not, please explain how the Compact would continue to qualify as a municipal aggregator.

C. Information Requests Relating to the Prefiled Testimony of Mr. Chretien

NSTAR-CLC/MEC-1-47 Please provide copies of (1) all prefiled testimony or reports (including all associated exhibits and attachments) submitted by Mr. Chretien to state and federal regulatory authorities from 1993 to the present; and (2) transcripts of Mr. Chretien's testimony at hearings (adjudicatory or non-adjudicatory) before state and federal regulatory authorities from 1993 to the present.

NSTAR-CLC/MEC-1-48 Provide copies of all regulatory decisions addressing the issues covered by Mr. Chretien in testimony provided in response to NSTAR-CLC/MEC-1-40. Identify the decision making authority, docket number, year of the decision, and any official citation to the decision.

NSTAR-CLC/MEC-1-49 Please describe any past or existing business relationship between Mass Energy and the Cape Light Compact. Provide any and all documents that relate to this response.

NSTAR-CLC/MEC-1-50 If NSTAR Green is not offered to customers, does Mass Energy intend to offer a renewable energy certificate product to NSTAR customers? If so, please explain why it has not done so to date.

NSTAR-CLC/MEC-1-51 Referring to page 3, lines 16-23, please provide any and all documents relating to the funding and implementation of the "Solar Boston" program.

NSTAR-CLC/MEC-1-52 Referring to page 4, lines 1-3, please provide any and all documents relating to the funding and implementation of the "green power consumer aggregation plan."

NSTAR-CLC/MEC-1-53 Referring to page 5, lines 1-6, please provide any and all documents relating to the RFP findings presented to the MTC regarding the inability “to find any competitive suppliers willing to serve the residential market in this state.”

NSTAR-CLC/MEC-1-54 Referring to page 6, lines 1-6, please provide the following for your New England Green Start 100% and 50% programs:

- (a) A description of the program offering
- (b) Customer eligibility criteria
- (c) Source, type and percentages of green resources provided
- (d) Pricing and term of customer commitment for green option(s)
- (e) A description of marketing efforts
- (f) Method that penetration rate was computed

NSTAR-CLC/MEC-1-55 Referring to page 6, lines 9-15, please provide any and all documents relating to:

- (a) Work “with environmental groups to assemble a product that balances several environmental concerns...”
- (b) Work performed by Mr. Chretien’s staff relating to “market research, looking at programs throughout the country, data provided...by MTC and.[Mass Energy’s] focus groups”
- (c) “[S]elling ReGen and promoting solar energy through a Department of Energy grant...”

NSTAR-CLC/MEC-1-56 Referring to page 6, lines 15-16, please provide the names, titles and resumes of the Mass Energy “staff” from 2001 to the present.

NSTAR-CLC/MEC-1-57 Referring to page 7, lines 3-7, please provide the number of “multi-year contract for certificates from new projects” that Mass Energy has entered into and indicate: (a) the term of the contract, i.e., beginning and ending dates; (b) the type of resource; and the number of certificates to be purchased under the contract(s).

NSTAR-CLC/MEC-1-58 Referring to page 9, line 23, what is the basis of the statement that NSTAR “can only serve 800 customers”?

- NSTAR-CLC/MEC-1-59 Referring to page 13, lines 13-17, is it Mass Energy's position that it is not prepared to serve NSTAR Electric customers until at least March 2005?
- NSTAR-CLC/MEC-1-60 Referring to page 13, lines 13-17, please describe Mass Energy's "multi-year commitment to the retail market." Is Mass Energy's commitment to the retail market solely in the context of its participation in the National Grid program?
- NSTAR-CLC/MEC-1-61 Referring to page 10, lines 18-20, what is the basis of the statement that "NSTAR would be ineligible for [Green-E] certification"? Provide any and all documents that relate to this response.